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November 17, 2023

**By ECF**

Hon. Taryn A. Merkl  
United States Magistrate Judge  
United States District Court for the Eastern District of NY  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Sylla et al., v. Amazon Labor Union et al.  
Civil Case No. 23- 05261 (AMD)

Dear Magistrate Merkl:

Defense counsel was not consulted before Mr. Schwartz sent his letter requesting an extension of time to respond to the issue of his disqualification. Plaintiff objects to this extension. This Court has time to rule on this matter prior to December 8, 2023.

Further, we take issue with Mr. Schwartz's implication that responding to the issues raised in the pre-motion letter will undermine settlement discussions. The issues regarding conflict and privilege with respect to his representation of Ms. Valentin Nieves are primarily legal issues.

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
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Jeanne Mirer